

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GARNELL BAILEY	:	No. 02-CV-4683
3563 Driftwood Place	:	
Bethlehem, PA 18020	:	
	:	
v.	:	
	:	
LUCENT TECHNOLOGIES INC.	:	
555 Union Boulevard	:	JURY TRIAL DEMANDED
Allentown, P A 18109-3286	:	
	:	
AND	:	HONORABLE JAMES KNOLL GARDNER
	:	
AGERE SYSTEMS INC.	:	
555 Union Boulevard	:	
Allentown, PA 18109-3286	:	

**MOTION FOR ENLARGEMENT  
OF TIME TO FILE PLAINTIFF'S RESPONSE  
TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Plaintiff Garnell Bailey, by and through her attorney, GLENNIS L. CLARK, ESQUIRE, hereby respectfully moves this Honorable court for an extension of time within which to file her response to Defendants' Motion for Summary Judgment. In support of this Motion, Plaintiff represents the following:

1. Pursuant to Order dated July 24, 2003, dispositive motions were to be completed by August 29, 2003.
2. On or about August 29, 2003 Defendant served Plaintiff with a Motion for Summary Judgment.

3. On or about September 2, 2003, Plaintiff's counsel received said Motion for Summary Judgment.

4. Counsel has been delayed in addressing the Brief because counsel's mother passed away on August 30, 2003 and he had to travel to North Carolina to make the necessary burial arrangements for Friday, September 5, 2003.

5. Counsel for plaintiff is out of the office the week of September 8, 2003 on a long scheduled vacation.

6. Counsel for Defendants has no objection to this motion, provided that all other pre-trial dates, including the date for the trial pool, are also extended.

7. Plaintiff respectfully request an additional thirty (30) days, up to and including October 19, 2003, and that all other pre-trial dates, including the date for the trial pool, also be enlarged by thirty (30) days.

Respectfully submitted:

Dated: \_\_\_\_\_

\_\_\_\_\_  
GLENNIS L. CLARK  
I. D. No. 36682  
Attorney for Plaintiff  
LAW OFFICE OF GLENNIS L. CLARK  
532 Walnut Street  
Allentown, PA 18101  
610-433-6624

**CERTIFICATE OF SERVICE**

I, Glennis L. Clark, Esquire, hereby certify that I have caused to be served a true and correct copy of the motion for enlargement of time to file Plaintiff's response to Defendant's Motion for Summary Judgment, via first class mail, postage prepaid on the date stated below to the offices of:

Robert W. Cameron, Esquire  
Littler, Mendelson  
Dominion Tower  
625 Liberty Avenue, 26th Floor  
Pittsburgh, PA 15222

Theodore A. Schroeder, Esquire  
Littler, Mendelson  
Dominion Tower  
625 Liberty Avenue, 26th Floor  
Pittsburgh, PA 15222

Dated: \_\_\_\_\_

\_\_\_\_\_  
GLENNIS L. CLARK  
I. D. No. 36682  
Attorney for Plaintiff  
LAW OFFICE OF GLENNIS L. CLARK  
532 Walnut Street  
Allentown, PA 18101  
610-433-6624

**CERTIFICATE OF CONCURRENCE**

I, Glennis L. Clark, certify that I contacted Defendants' counsel, Robert W. Cameron, Esquire, and Theodore A. Schroeder, Esquire, and they concur with the within Motion for Enlargement of Time.

Dated: \_\_\_\_\_

\_\_\_\_\_  
GLENNIS L. CLARK  
I. D. No. 36682  
Attorney for Plaintiff  
LAW OFFICE OF GLENNIS L. CLARK  
532 Walnut Street  
Allentown, PA 18101  
610-433-6624